

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ABBOT WILLIAM AHO, a/k/a BOOGIE;  
JOSIAH TOMAS AGUILAR, a/k/a JO JO;  
SARAH ANN CARLSON, a/k/a RAH RAH;  
NICHOLAS DAKOTA MAY; and  
JARED CHRISTOPHER KAUL

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 371,  
924(c)(1), 1951(a), and 2; and 21  
U.S.C. §§ 841(b)(1)(D), 846,  
848(a), and 848(c)

**COUNT ONE**

**Conspiracy to Interfere with Commerce by Threats and Violence –  
Hobbs Act Robbery**

The Grand Jury Charges:

From in or about January 2019 through May 2019, in the Districts of North Dakota,  
Minnesota, and elsewhere,

ABBOT WILLIAM AHO, a/k/a BOOGIE;  
JOSIAH TOMAS AGUILAR, a/k/a JO JO;  
SARAH ANN CARLSON, a/k/a RAH RAH;  
NICHOLAS DAKOTA MAY; and  
JARED CHRISTOPHER KAUL

did knowingly and intentionally combine, conspire, confederate, and agree together and  
with others, both known and unknown to the grand jury, unlawfully obstruct, delay, and  
affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of  
articles and commodities in commerce, by robbery and extortion, as those terms are defined  
in 18 U.S.C. §§ 1951(b)(1) and (b)(2), in violation of Title 18, United States Code, Sections  
371 and 1951(a).

Overt Acts

1. It was a part of said conspiracy that members of the conspiracy worked together to commit numerous robberies and the leadership of the conspiracy described themselves as the “Slither Gang.” This gang, and individuals working on their behalf, targeted victims for robbery who were engaged in drug trafficking in North Dakota, Minnesota, and elsewhere;

2. It was further a part of said conspiracy that co-conspirators would and did conduct numerous robberies in North Dakota, Minnesota, and elsewhere. During the robberies co-conspirators used violence, threats of violence, and brandished firearms and other dangerous weapons to further their crimes of violence. These robberies include, but are not limited to:

- (a) On or about January 25, 2019, in Fergus Falls, Minnesota, co-conspirators robbed victims from White Bear Lake, Minnesota, of several hundred marijuana cartridges;
- (b) In or about January 2019, in West Fargo, North Dakota, co-conspirators robbed J.E.D. of approximately two pounds of marijuana, marijuana wax, marijuana cartridges, and United States currency;
- (c) In or about January 2019, in Fargo, North Dakota, co-conspirators attempted to rob K.R.C.A. of marijuana;
- (d) In or about February 2019, in Moorhead, Minnesota, co-conspirators robbed S.V.A. of several pounds of marijuana, marijuana cartridges, and United States currency;

- (e) In or about January through March of 2019, co-conspirators robbed victims in Andover, Minnesota, of marijuana wax, marijuana cartridges, United States currency, and two firearms;
- (f) On or about March 4, 2019, in Fargo, North Dakota, co-conspirators robbed T.N.D. and J.D.M. of approximately seven pounds of marijuana, marijuana cartridges, United States currency, and numerous items of personal property;
- (g) On or about April 19, 2019, in Fargo, North Dakota, co-conspirators robbed M.J.D.S. of approximately one pound of marijuana and associates of M.J.D.S. retaliated, resulting in substantial injuries to defendant ABBOT WILLIAM AHO, a/k/a BOOGIE;
- (h) On or about May 6, 2019 in Fargo, North Dakota, co-conspirators robbed D.A.M. of approximately one pound of marijuana and United States currency; and
- (i) Co-conspirators committed several other robberies in the vicinity of 1631 Belsly Boulevard in Moorhead, Minnesota. Co-conspirators obtained marijuana and other items from these victims.

Co-conspirators effectuated the above robberies by conducting home invasions or setting up victims to meet at a public place and robbing them;

3. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;

4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities including, but not limited to, internet-based communication applications such as Snapchat. Snapchat is engaged in activity affecting interstate commerce by operating a free access social networking website located in Santa Monica, California, with a mobile phone application that allows sending and receiving “self-destructing” messages and pictures. Snap Inc. manages records for Snapchat and there are approximately 700 million “snaps” processed daily;

5. As more fully described in Count Eight of this Indictment, it was further a part of said conspiracy that members of the conspiracy possessed with the intent to distribute LSD and marijuana, Schedule I controlled substances, in North Dakota, Minnesota, and elsewhere. Members of the conspiracy would sell controlled substances taken in robberies and purchase controlled substances with proceeds taken from the robberies; and

6. Defendant ABBOT WILLIAM AHO, a/k/a BOOGIE, was the organizer, leader, manager, and supervisor of this criminal conspiracy;

In violation of Title 18, United States Code, Sections 371 and 1951(a).

COUNT TWO

**Interference with Commerce by Threats and Violence – Hobbs Act Robbery**

The Grand Jury Further Charges:

On or about January, 2019, in the District of North Dakota,

ABBOT WILLIAM AHO, a/k/a BOOGIE,

did unlawfully obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of articles and commodities in commerce, by robbery and extortion, as those terms are defined in 18 U.S.C. §§ 1951(b)(1) and (b)(2), in that the defendant did unlawfully take personal property including, but not limited to, controlled substances and United States currency belonging to J.E.D. in West Fargo, North Dakota, by means of actual and threatened force, violence, and fear of immediate and future injury to the person;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

**Use of a Firearm During and in Relation to a Crime of Violence**

The Grand Jury Further Charges:

In or about January 2019, in the District of North Dakota,

ABBOT WILLIAM AHO, a/k/a BOOGIE,

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit:

ABBOT WILLIAM AHO, a/k/a BOOGIE, used, carried, and brandished a firearm during and in relation to the Interference with Commerce by Threats and Violence – Hobbs Act Robbery of J.E.D., as set forth in Count Two above;

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

**Interference with Commerce by Threats and Violence – Hobbs Act Robbery**

The Grand Jury Further Charges:

On or about March 4, 2019, in the District of North Dakota,

ABBOT WILLIAM AHO, a/k/a BOOGIE;  
JOSIAH THOMAS AGUILAR, a/k/a JO JO; and  
NICHOLAS DAKOTA MAY

did unlawfully obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of articles and commodities in commerce, by robbery and extortion, as those terms are defined in 18 U.S.C. §§ 1951(b)(1) and (b)(2), in that the defendants did unlawfully take personal property, including, but not limited to, controlled substances and United States currency belonging to T.N.D. and J.D.M. in Fargo, North Dakota, by means of actual and threatened force, violence, and fear of immediate and future injury to the person;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

**Use of a Firearm in During and in Relation to a Crime of Violence**

The Grand Jury Further Charges:

On or about March 4, 2019, in the District of North Dakota,

ABBOT WILLIAM AHO, a/k/a BOOGIE, and  
JOSIAH TOMAS AGUILAR, a/k/a JO JO,

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit: ABBOT WILLIAM AHO, a/k/a BOOGIE, and JOSIAH TOMAS AGUILAR, a/k/a JO JO, used, carried, and brandished a firearm during and in relation to the Interference with Commerce by Threats and Violence – Hobbs Act Robbery of T.N.D. and J.D.M., as set forth in Count Four above;

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.



COUNT SIX

**Interference with Commerce by Threats and Violence – Hobbs Act Robbery**

The Grand Jury Further Charges:

On or about May 6, 2019, in the District of North Dakota,

JOSIAH TOMAS AGUILAR, a/k/a JO JO, and  
SARAH ANN CARLSON, a/k/a RAH RAH,

did unlawfully obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of articles and commodities in commerce, by robbery and extortion, as those terms are defined in 18 U.S.C. §§ 1951(b)(1) and (b)(2), in that the defendants did unlawfully take personal property, including, but not limited to, controlled substances and United States currency belonging to D.A.M. in Fargo, North Dakota, by means of actual and threatened force, violence, and fear of immediate and future injury to the person;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVEN

**Use of a Firearm During and in Relation to a Crime of Violence**

The Grand Jury Further Charges:

On or about May 6, 2019, in the District of North Dakota,

JOSIAH TOMAS AGUILAR, a/k/a JO JO, and  
SARAH ANN CARLSON, a/k/a RAH RAH,

did knowingly use, carry, and brandish a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit: JOSIAH TOMAS AGUILAR, a/k/a JO JO, and SARAH ANN CARLSON, a/k/a RAH RAH, used, carried, and brandished a firearm during and in relation to the Interference with Commerce by Threats and Violence – Hobbs Act Robbery of D.A.M., as set forth in Count Six above;

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT EIGHT

**Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances**

The Grand Jury Charges:

From in or about January 2019 to May 2019, in the Districts of North Dakota,  
Minnesota, and elsewhere,

ABBOT WILLIAM AHO, a/k/a BOOGIE;  
JOSIAH THOMAS AGUILAR, a/k/a JO JO;  
NICHOLAS DAKOTA MAY; and  
JARED CHRISTOPHER KAUL

did knowingly and intentionally combine, conspire, confederate, and agree together and  
with others, both known and unknown to the grand jury, to possess with intent to distribute  
and distribute in excess of a mixture and substance containing a detectable amount lysergic  
acid diethylamide (LSD) and marijuana, Schedule I controlled substances, in violation of  
Title 21, United States Code, Section 841(b)(1)(D), and Title 18, United States Code,  
Section 2.

Overt Acts

1. It was a part of said conspiracy that members of the conspiracy possessed with the  
intent to distribute LSD and marijuana, Schedule I controlled substances, in North Dakota,  
Minnesota, and elsewhere;

2. It was further a part of said conspiracy that the defendants and others would and  
did attempt to conceal their activities;

3. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities including, but not limited to, internet-based communication applications such as Snapchat;

4. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

5. It was further a part of said conspiracy that in or about April 2019, co-conspirators possessed with the intent to distribute LSD, a schedule I controlled substance, in Moorhead, Minnesota;

6. It was further a part of said conspiracy that members of the conspiracy did possess with the intent to distribute and distribute controlled substances taken in robberies more fully described in Counts One, Two, Four, and Six, and purchased controlled substances with proceeds taken from the robberies. Counts One, Two, Four, and Six are incorporated herein by reference; and

7. Defendant ABBOT WILLIAM AHO, a/k/a BOOGIE, was the organizer, leader, manager, and supervisor of this criminal conspiracy;

In violation of Title 21, United States Code, Sections 841(b)(1)(D) and 846;  
Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT NINE

**Continuing Criminal Enterprise**

The Grand Jury Further Charges:

From in or about January 2019 to May 2019, in the Districts of North Dakota, Minnesota, and elsewhere,

ABBOT WILLIAM AHO, a/k/a BOOGIE,

did knowingly and intentionally engage in a Continuing Criminal Enterprise in that he did violate Title 21, United States Code, Sections 841(b)(1)(D) and 846 including, but not limited to, the violations alleged in Counts One, Two, Four, Six, and Eight of this Indictment. These counts are incorporated herein by reference. The above-described violations were, and are, part of a continuing series of violations. These continuing series of violations were undertaken by ABBOT WILLIAM AHO, a/k/a BOOGIE, in concert with at least five other persons with respect to whom ABBOT WILLIAM AHO, a/k/a BOOGIE, occupied a position of organizer, supervisor, and manager including, but not limited to, the following individuals: (1) C.J.C.; (2) JOSIAH THOMAS AGUILAR, a/k/a JO JO; (3) J.L.B.; (4) E.J.B.; (5) A.M.F.; (6) SARAH ANN CARLSON, a/k/a RAH RAH; (7) S.L.D.; (8) NICHOLAS DAKOTA MAY; and (9) JARED CHRISTOPHER KAUL;

From this continuing series of violations ABBOT WILLIAM AHO, a/k/a BOOGIE,  
did obtain substantial income;

In violation of Title 21, United States Code, Sections 848(a) and 848(c).

A TRUE BILL:

/s/ Foreperson  
Foreperson

/s/ Drew H. Wrigley  
DREW H. WRIGLEY  
United States Attorney

CCM:ld